

U.S. DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
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U.S. DISTRICT COURT  
WESTERN DISTRICT  
OF LOUISIANA  
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2015 JAN 21 P 10:09

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THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE-OPELOUSAS DIVISION

SLOANE ROBERTS

Civil Action No:

Jury Demanded

*Plaintiff*

V

WAL-MART STORE STORES, OFFICER JASON HEBERT, DETECTIVE  
JEFFERY CREDEUR, SONNY STUTES, LT. SAMMY INZARAELLA, *officer Jason Haine*

*Defendant*

*(All defendants sued in their individual and official capacity)*

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COMPLAINT FOR DAMAGES

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TO THE HONORABLE JUDGE OF THIS COURT:

This is an action for damage arising under 42 USC 1983, 1985, 1988; 4th Amendment Unlawful Search and Seizure and 14th Amendment to the United States and Louisiana Constitution; Louisiana Civil Code Article 2315; FALSE ARREST; FALSE IMPRISONMENT; Defamation, Libel, Failure to train and Supervise, intentional Infliction of Emotional Distress and MALICIOUS PROSECUTION

U.S. DISTRICT COURT  
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2015 JAN 21 P 10:10

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### **PARTIES**

NOW COMES SLOANE ROBERTS, hereinafter called Plaintiff, complaining of and about hereinafter called defendants, WAL-MART STORE STORES, DETECTIVE JASON HEBERT, DETECTIVE JEFFERY CREDEUR, DETECTIVE SONNY STUTES, LT. SAMMY INZARAELLA, and for cause of actions alleges unto this Honorable Court the following:

1. Plaintiff, SLOANE ROBERTS, is a citizen of the United States and of the State of Louisiana and she resides in the city of Lafayette located in Lafayette Parish.
2. Defendant, OFFICER JASON HEBERT, is employed by the Abbeville Police Department and can be served at 304 Charity Street, Abbeville, LA 70510
3. Defendant, DETECTIVE JEFFERY CREDEUR, is employed by the Broussard Police Department and can be served at 414 East Main Street, Broussard, LA 70518
4. Defendant, DETECTIVE SONNY STUTES is employed by the Lafayette Parish Sheriff's Office and can be served at 316 West Main Street, Lafayette, LA 70501
5. Defendant, LT. SAMMY INZARAELLA is employed by the Vermilion Parish Sheriff's Office and can be served at 101 South State Street Abbeville La. 70510

WESTERN DISTRICT COURT  
OF LOUISIANA  
FILED  
2015 JAN 21 P 10:10  
TONY E. MOORE  
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6. Defendant, WAL-MART stores who can be served C T CORPORATION SYSTEM, 5615 CORPORATE BLVD., STE. 400B, BATON ROUGE, LA 70808
7. At all relevant times, the defendants were in the course and scope of their employment and they were acting under color of state law

### **JURISDICTION AND VENUE**

8. Plaintiffs reallege and incorporate by reference the allegations set forth in paragraph 1 through 8 as set forth above.
9. Jurisdiction is asserted pursuant to 28 U.S.C. § 1331, 1332, 1343 and under 42 USC 1983 and 1985
10. The alleged unlawful act took place at Lafayette, La.,
11. Venue in this district is appropriate pursuant to 28 U.S.C. § 1391.

### **NATURE OF THE CASE**

12. Plaintiff realleges and incorporates by reference the allegations set forth in paragraphs 9 through 15 as set forth above.
13. This action is brought to this Honorable Court under 4th amendment, 14th amendment, Title 42 U.S.C. § 1983, 1985; Plaintiff, SLOANE ROBERTS, were adversely affected by these practices.

U.S. DISTRICT COURT  
WESTERN DISTRICT  
OF LOUISIANA  
FILED  
2015 JAN 21 P 10:10  
TONY R. MOORE  
CLERK  
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### FACTS

14. Plaintiff realleges and incorporates by reference the allegations set forth in paragraphs 1 through 16 as set forth above.
15. Plaintiff, SLOANE ROBERTS, is a Caucasian – American female
16. This lawsuit stems from an accusation by Wal-mart stores in Vermillion and Lafayette Parishes that SLOANE ROBERTS passed counterfeit money.
17. Detective Jason Hebert obtained an arrest warrant and traveled to Lafayette parish to initiate a search of Sloane Roberts residence.
18. Detective Jeffery Credeur obtained an arrest warrant also and traveled from Broussard to Maurice to assist Detective Hebert and Detective Sammy Stutes, Lafayette Parish Sheriff's Office to search SLOANE's home.
19. While in the home Detective Hebert and removed several items.
20. Detective Hebert communicated with several news outlets informing the public of the search and eventual arrest of SLOANE ROBERTS for passing counterfeit money.
21. Jason Hebert was assisted by the aforementioned defendants in arresting SLOANE ROBERTS on March 11, 2010 and charged her with principal to 18 counts of Monetary Instrument abuse.

U.S. DISTRICT COURT  
WESTERN DISTRICT  
OF LOUISIANA  
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2015 JAN 21 P 10:11

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22. SLOANE sat in jail for approximately 8 months in Lafayette Parish and then she was removed to Vermillion Parish before she ultimately bonded out of jail.
23. SLOANE ROBERTS was charged in both Vermillion and Lafayette Parish as a principle to monetary instrument abuse.
24. The Charges in Vermillion Parish were dismissed on or about December 12, 2012.
25. The Charges in Lafayette Parish were dismissed on January 21, 2014.

#### **REQUEST FOR RELIEF**

**WHEREFORE**, plaintiff respectfully prays that this Honorable Court:

1. Grant to the Plaintiff: General damages for damages to reputation, inconvenience, past and future mental anguish, loss of the enjoyment of life and such other and further relief as this court deems just and proper.
2. Grant to Plaintiff his attorney's fees (including expert fees) and costs in connection with this action and its prosecution of the underlying charge of violation of civil rights; and

U.S. DISTRICT COURT  
WESTERN DISTRICT  
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2015 JAN 21 P 10:11

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BY:

**PRAYER**

WHEREFORE, PREMISES CONSIDERED, plaintiff, ~~SLOANE ROBERTS~~, respectfully prays that the Defendants, WAL-MART STORE STORES, OFFICER JASON HEBERT, DETECTIVE JEFFERY CREDEUR, SONNY STUTES, LT. SAMMY INZARAELLA, be cited to appear and answer herein, and that upon a final hearing of the cause, judgment be entered for the Plaintiff, SLOANE ROBERTS, against Defendant for damages in an amount within the jurisdictional limits of the Court; together with interest as allowed by law; costs of court, and such other and further relief to which the Plaintiff may be entitled at law or in equity.

Respectfully Submitted



BY: /s/SLOANE ROBERTS in proper person

109 Amhurst Drive  
Maurice, La. 70555